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+ AWAITING ADMISSION  
 ++ OF COUNSEL

August 8, 2025

VIA ELECTRONIC COURT FILING and  
 VIA UPS OVERNIGHT MAIL  
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Honorable Sanket J. Bulsara  
 United States District Court  
 Eastern District of New York  
 100 Federal Plaza  
 Courtroom 930  
 Central Islip, NY 11722

Re: AA Medical, P.C. v. Iron Workers Local 40, 361 & 417 Health Fund  
 Civil Action No.: 22-CV-01249 (SJB)(LGD)

Dear Judge Bulsara:

This firm is counsel to Defendant, Iron Workers Local 40, 361 & 417 Health Fund, regarding the above referenced matter.

As per your motion bundle rules, enclosed please find courtesy copies of the following:

- 1) Defendant's Notice of Motion for Summary Judgment;
- 2) Defendant's Declaration of Thomas P. Keane, Esq. in Support of Motion for Summary Judgment with Exhibits;
- 3) Defendant's Affidavit of Brian Sabbagh in Support of Motion for Summary Judgment with Exhibits;
- 4) Defendant's Memorandum of Law in Support of Motion for Summary Judgment.
- 5) Defendant's Rule 56.1 Statement of Undisputed Material Facts;
- 6) Defendant's Affidavit of Service dated May 9, 2025;
- 7) Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment dated June 27, 2025;
- 8) Plaintiff's Response to Defendant's Rule 56.1 Statement of Undisputed Material Facts and Counterstatement of Material Facts dated June 27, 2025;
- 9) Plaintiff's Affirmation of Dimitri Teresh, Esquire in Opposition to Defendants' Motion for Summary Judgment;
- 10) Defendant's Reply Memorandum of Law in Further Support of its Motion for Summary Judgment dated August 8, 2025; and
- 11) Defendant's Affidavit of Service dated August 8, 2025.

Also, please be aware that the motion documents listed above are exact copies of the electronically filed documents that were uploaded to the Court's ECF system this date.

Honorable Sanket J. Bulsara  
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Thank you for your time and attention to this matter.

Respectfully,

COLLERAN, O'HARA & MILLS L.L.P.

By: /s/ Thoms P. Keane  
THOMAS P. KEANE

cc: Ryan Milun, *via* Overnight Mail & ECF  
Dimitri Teresh *via* Overnight Mail & ECF

3028-0010